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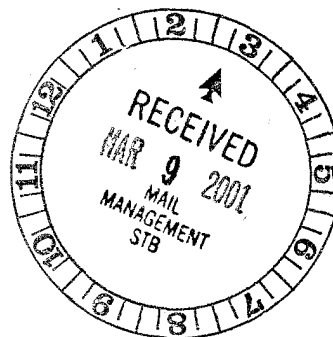
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March 8, 2001

JOHN H. BROADLEY

Surface Transportation Board
Office of the Secretary
Case Control Unit
1925 K Street NW
Washington, D.C. 20423-0001

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Office of the Secretary
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Re: STB Ex Parte No. 582 (Sub-No. 1) Oral Argument

Dear Sir/Madam:

This is a request on behalf of the Port of Seattle for ten (10) minutes of oral argument time. Oral argument would be presented by John H. Broadley, the attorney for Port of Seattle. The issues the Port wishes to address in oral argument are as follows:

1. The nature of the enhanced rail competition the Board's proposed guidelines should require.

The Port has endorsed the Board's approach of ensuring that after a merger of Class I railroads there be enhanced competition in the industry. The Port has concerns that the call of some commenters for enhanced competition in the industry could adversely affect the ability of the railroads to provide efficient and responsive rail service. In oral argument the Port would address the nature of the enhanced competition the Board's guidelines should impose.

2. The need for the Board to consider the transportation system as a whole in evaluating the effect of rail mergers.

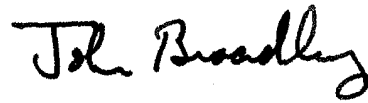
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The rail network is simply one component in a broader transportation infrastructure that serves shippers in the United States and world wide. The Port wishes to explain the need for such a broader consideration of the entire transportation infrastructure in evaluating rail mergers.

Yours very truly,

A handwritten signature in black ink, appearing to read "John Broadley". The signature is written in a cursive, slightly slanted style.

John Broadley